

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

STEPHEN McCOLLUM and SANDRA	§	
McCOLLUM, individually, and	§	
STEPHANIE KINGREY, individually and	§	
as independent administrator of the	§	
ESTATE OF LARRY GENE	§	
McCOLLUM,	§	CIVIL ACTION NO. 4:14-cv-03253
Plaintiffs,	§	
	§	
v.	§	
	§	
BRAD LIVINGSTON, et al.,	§	
Defendants.	§	

DR. CHARLES ADAMS' OBJECTIONS AND RESPONSES TO PLAINTIFFS'
SUBPOENA DUCES TECUM ATTACHED AS EXHIBIT A TO THEIR APRIL 11, 2016
NOTICE TO TAKE DR. CHARLES ADAMS' DEPOSITION

EXHIBIT A

From: Edwards Law

Fax: (888) 325-5677

To: +15124959139

Fax: +15124959139

Page 2 of 8 04/11/2016 1:11 PM

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

**PLAINTIFFS' NOTICE TO TAKE THE ORAL DEPOSITION OF
DR. CHARLES ADAMS AND SUBPOENA DUCES TECUM**

TO: **Dr. Charles "Danny" Adams** by and through attorney of record, Lee Haney, Assistant Attorney General, P.O. Box 12548, Capitol Station Austin, Texas 78711.

Please take notice that on May 18, 2016, at 8:00 am and thereafter from day to day until completed, Plaintiffs will take the oral deposition of Defendants' expert witness Dr. **Charles Adams**. The witness is required to provide by May 11 the documents and other items described in Exhibit "A," which is attached hereto and incorporated herein.

The deposition is for the purpose of discovering, securing, and completing testimony of the witness. The deposition will be taken at the Office of the Attorney General of Texas in Austin, 300 West 15th Street, Austin, TX 78701 and will continue thereafter from day to day until completed. The deposition will be recorded

From: Edwards Law

Fax: (888) 325-5677

To: +15124959139

RECEIVED 04/11/2016 12:59

Fax: +15124959139

Page 3 of 8 04/11/2016 1:11 PM

stenographically and may be videotaped.

Dated: April 11, 2016.

Respectfully submitted,

EDWARDS LAW
The Haehnel Building
1101 East 11th Street
Austin, TX 78702
Tel. (512) 623-7727
Fax. (512) 623-7729

By: /s/ Jeff Edwards
JEFF EDWARDS
State Bar No. 24014406
Attorney-in-Charge
SCOTT MEDLOCK
State Bar No. 24044783
DAVID JAMES
State Bar No. 24092572
Federal ID No. 2496580

Michael Singley
THE SINGLEY LAW FIRM, PLLC
State Bar No. 00794642
4131 Spicewood Springs Rd.
Austin, Texas 78759
Tel. (512) 334-4302
Fax. (512) 727-3365

Abigail Frank
Texas Bar No. 24069732
Southern District No. 1076613
Wayne Krause Yang
State Bar No. 24032644
TEXAS CIVIL RIGHTS PROJECT
1405 Montopolis Dr.,
Austin, TX 78741
Tel. (512) 474-5073
Fax. (512) 474-0726

Wallis Nader
Texas Bar No. 24092884
Southern District No. 2609150
wallis@texascivilrightsproject.org

RECEIVED 04/11/2016 12:59

From: Edwards Law Fax: (888) 325-5677

To: +15124959139

Fax: +15124959139

Page 4 of 8 04/11/2016 1:11 PM

TEXAS CIVIL RIGHTS PROJECT---
HOUSTON
2006 Wheeler Ave
Houston, TX 77004
Tel. (832) 767-3650
Fax. (832) 554-9981

Jeremy Doyle
State Bar No. 24012553
Federal ID No. 24559
Nathan Smith
State Bar No.: 24053060
Federal ID No. 1075505
Andrew "Drew" Pennebaker
State Bar No.: 24083645
Federal ID No. 2621125
REYNOLDS FRIZZELL LLP
1100 Louisiana
Suite 3500
Houston, Texas 77002
Tel. (713) 485-7200
Fax. (713) 485-7250

ATTORNEYS FOR PLAINTIFFS

From: Edwards Law

Fax: (888) 325-5677

To: +15124959139

RECEIVED 04/11/2016 12:59

Fax: +15124959139

Page 5 of 8 04/11/2016 1:11 PM

CERTIFICATE OF SERVICE

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record through email and/or fax.

Cc: Cynthia Burton,
Assistant Attorney General
P.O. Box 12548
Capitol Station
Austin, Texas 78711
Facsimile: 512-495-9139

Graig Alvarez
Fenelius Alvarez Simon PLLC
1221 McKinney St., Ste. 3200
Houston, TX 77010-2011
Facsimile: 713-654-4039

Exhibit A

The categories of documents, items and things which the deponent is directed to produce by May 11 are as follows: As used below, the term "you" includes your staff and all individuals and entities working at your direction.

1. All documents you have reviewed in preparation for your deposition.
2. All documents or other materials you have reviewed, consulted, or relied upon in forming your opinions or conducting your work in connection with this case.
3. All documents evidencing any agreement between you and TDCJ or their attorneys or representatives.
4. All documents or other materials provided to you by counsel for Defendants in connection with this case.
5. All notes you have prepared or documents you have created in connection with this case.
6. Any documents you reviewed regarding decisions not to air condition any Texas Department of Criminal Justice prison facility.
7. Your most recent curriculum vitae.
8. Any correspondence, reports, deposition transcripts, or demonstrative exhibits pertaining to any Texas inmate that suffered heat exhaustion, heat stroke, or other heat-related illness, including Eugene Blackmon, for which you were an expert witness on behalf of either TDCJ or UTMB.